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8 Attorney for Defendant
9 MRS BPO, LLC (AKA MRS. ASSOCIATES)

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

12 **FRANK ANTONIO CORONA,**

13 Plaintiff,

14 vs.

15 **MRS BPO, LLC. (AKA MRS**
16 **ASSOCIATES), and DOES 1-100,**

17 Defendants.
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19
20

CASE NO.: '13CV1511 WQHRBB

NOTICE OF REMOVAL

Hon.
Courtroom:

21
22 **COMES NOW** Defendant MRS BPO, LLC ("MRS") and for Removal of
23 the above-styled cause to this Court, Defendant MRS respectfully shows:

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25 1. On or about May 17, 2013, an action was commenced against
26 Defendant in the Superior Court of California County of San Diego, Central
27 Division, entitled *Frank Antonio Corona v. MRS BPO, LLC. (AKA MRS*
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1 2. A copy of the Summons and Complaint therein were served on
2 Defendant by mail received on June 1, 2013.
3

4 3. This Notice of Removal is being filed within 30 days of the date
5 upon which Defendant received a copy of the Plaintiff's Complaint.
6

7 4. A true and accurate copy of the Complaint in this case is attached
8 hereto as Exhibit 1.
9

10 5. Plaintiff's Complaint alleges Plaintiff is an adult residing in the
11 County of San Diego, State of California.
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13 6. Defendant MRS is a New Jersey limited liability company with its
14 principal place of business in Cherry Hill, New Jersey.
15

16 7. The Complaint alleges the action is brought under the Fair Debt
17 Collection Practices Act, 15 U.S.C. §1692 *et seq* and the Telephone Consumer
18 Protection Act, 47 U.S.C. §227 *et seq*. As such, this court has Federal Question
19 jurisdiction over this action pursuant to 28 U.S.C. §1331.
20

21 8. This case is a civil action which may be removed to this Court by
22 Defendant under the provisions of 28 USC §§1331 and 1441, in that Plaintiff
23 alleges the controversy arises under 15 USC §1692, *et seq*. and 47 U.S.C. §227 *et*
24 *seq*.
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1 **WHEREFORE**, Defendant prays that the Court assume jurisdiction of this
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3 cause and proceed with it to completion, and to enter such orders and judgments
4 as may be necessary to protect its jurisdiction or as justice may require.

5 Dated: June 30, 2013

Respectfully submitted,

6
7 MORRIS LAW, PC

8
9 By: /s/ Aimee R. Morris

Aimee R. Morris

10 Attorney for Defendant

11 MRS BPO, LLC

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